

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
**4: CR 18-173**

UNITED STATES OF AMERICA : CRIMINAL NO.  
: JUDGE BRANN  
: (JUDGE )  
v. :  
: FILED VIA ECF  
MARC PUNZALAN

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE  
Stalking  
18 U.S.C. § 2261A

FILED  
WILLIAMSPORT  
MAY 24 2018  
PER   
DEPUTY CLERK

From on or about June 11, 2013 to on or about June 12, 2013, in South Williamsport, Lycoming County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

MARC PUNZALAN,

with intent to harass and intimidate and cause substantial emotional distress to a person in another state did use an interactive computer service, and a facility of interstate or foreign commerce to engage in a course of conduct that caused substantial emotional distress to that person, and the death of that person.

All in violation of Title 18, United States Code, Section 2261A(2).

COUNT 2  
Attempted Sexual Exploitation of a Child  
18 U.S.C. § 2251(a)

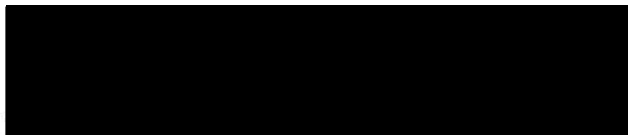
From on or about June 11, 2013 to on or about June 12, 2013, in South Williamsport, Lycoming County, within the Middle District of Pennsylvania, and elsewhere, the defendant,

MARC PUNZALAN,

did attempt to employ, use, persuade, induce, entice, and coerce, A.J., a minor female, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported in interstate or foreign commerce, and that such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

A TRUE BILL



FOREMAN

Date: 5/24/18

DAVID J. FREED  
United States Attorney



GEOFFREY W. MacARTHUR  
Assistant United States Attorney

Date: 5/24/18